NO. 48898-1-II

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION TWO

STATE OF WASHINGTON,

Respondent,

v.

KYLE BRYCELAND,

Appellant.

ON APPEAL FROM THE SUPERIOR COURT OF THE
STATE OF WASHINGTON FOR KITSAP COUNTY

The Honorable Leila Mills, Judge

BRIEF OF APPELLANT

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A. ASSIGNMENTS OF ERROR

1. Improper comments on appellant's exercise of his constitutional right to silence violated due process and denied him a fair trial.

2. The court erred in admitting an irrelevant recorded statement over defense objection.

3. This Court should exercise its discretion to deny appellate costs should the State substantially prevail on appeal.

Issues pertaining to assignments of error

1. After his arrest appellant was advised of his constitutional rights. Although he agreed to speak, he chose not to answer some of the detective's questions. The detective testified at trial that appellant was talking in circles and it was clear he did not want to cooperate. Does this comment on appellant's exercise of his constitutional right to silence require reversal?

2. At trial the State presented, over defense objection, a recording of a phone conversation appellant had while in jail, in which the person he spoke to told him he had to prove his innocence by answering questions about the State's evidence. Did the State's use of this recorded statement constitute an indirect comment on appellant's right to silence?

3. Where the recorded statement had no probative value and served only to create an inference that appellant's exercise of his constitutional rights was consistent with guilt, did the trial court err in denying the defense motion to exclude the recording?

2. Given the serious problems with the LFO system recognized by our Supreme Court in Blazina, should this Court exercise its discretion to deny cost bills filed in the cases of indigent appellants?

B. STATEMENT OF THE CASE

1. Procedural History

The Kitsap County Prosecuting Attorney charged appellant Kyle Bryceland with first degree robbery as a principal and/or accomplice. CP 17; RCW 9A.56.200(1); RCW 9A.56.190; RCW 9A.08.020(2)(c). Bryceland was also charged with second degree driving while license suspended or revoked, and he entered a guilty plea to that charge. CP 18, 45-55; RCW 46.20.342(1)(b). The case proceeded to jury trial on the robbery charge before the Honorable Leila Mills, and the jury returned a guilty verdict. CP 70. The court imposed a low-end standard range sentence of 31 months, and Bryceland filed this timely appeal. CP 80-81, 90.

2. Substantive Facts

On the evening of January 12, 2016, Hunter Trerise made plans with his friend Devan Kluge to smoke methamphetamine with Chris Jones, and he contacted Kyle Bryceland for a ride to Jones's place. 2RP[1] 129, 187. Bryceland and Jones headed to Trerise's house, with Bryceland driving Jones's car. On the way, they picked up Angelo Lundy. 2RP 248-49. Bryceland dropped Jones off in an alley near Trerise's house and then picked up Trerise and Kluge. 2RP 250. Once they were in the car, Bryceland pulled back into the alley and stopped the car so that Lundy could move his backpack to the trunk to make room in the backseat for other passengers. 2RP 132, 252-53. Bryceland got out of the car and opened the trunk for Lundy. 2RP 134, 253.

While Bryceland and Lundy were out of the car, a man wearing a bandana over his face approached and pointed a gun at Trerise through the open passenger window. 2RP 135, 137. Trerise later identified the man as Jones. 2RP 152. Jones told Trerise to give him everything he had, and Trerise took off a watch and bracelet and threw them to the floor of the car. 2RP 136, 171. He and Kluge then ran back to Trerise's house and called 911. 2RP 138-39.

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[1] The Verbatim Report of Proceedings is contained in five volumes, designated as follows: 1RP—4-4-16; 4-5-16; 2RP—4-6-16; 3RP—4-7-16; 4RP—4-8-16; 5RP—4-29-16.

Acting on information from Trerise, police located Jones's car at a convenience store. 2RP 221. Trerise was brought to the scene to identify his belongings in the car and to identify Jones, Bryceland, and Lundy. 2RP 149-51. Chaiss Pry was with them as well, and all four were arrested. 2RP 151, 279.

In a search of Jones's car, police found a BB gun replica of a .45 caliber pistol under the driver's seat. 3RP 330-31. Trerise's watch, bracelet, and cell phone were found in the front passenger area, as well as a black bandana and two hats. 3RP 335-36. In the trunk police found Lundy's backpack, which contained numerous credit cards and gift cards, a social security card, a checkbook, a blank check, and passports in various names, some of which had been reported stolen. 3RP 349-51. A large amount of methamphetamine and heroin was found in the backseat area, along with baggies, a pocket knife, and a scale. 3RP 338-40.

During a police interview that night, Bryceland said he had been on the west side of Bremerton and drove to the east side with Jones and Lundy. 2RP 282-83. When asked if he thought Jones intended for anyone to get hurt, Bryceland said he did not think so, but he did not really know what was going on in Jones's mind. 2RP 285. Bryceland said he dropped Jones off, he did not know what Jones did, and then Jones was back in the car. He said he was on the west side doing what Jones wanted him to do,

but he did not say what that was. 2RP 285. He said he didn't know anything about a gun. 2RP 286-87.

In phone calls he made from the jail over the next few weeks, Bryceland referred to Jones as the person who committed the crime, saying he was out of the vehicle when it happened. He also said that Pry had snitched on him. Exhibit 35.

Defense counsel argued in closing that Bryceland knew there was going to be a drug deal that night, but he did not know there was going to be a robbery, and he did not know there would be a replica firearm used in the crime. 3RP 457. Bryceland was not the mastermind, but he was the driver for the drug deal. He was told to drop Jones off in the alley so he could get methamphetamine to sell to Trerise and Kluge. 3RP 459-60. Although Bryceland clearly knew there had been a robbery by the time he made the recorded jail phone calls, that did not mean he knew beforehand that the robbery would happen. 3RP 463.

C. ARGUMENT

1. COMMENTS ON BRYCELAND'S EXERCISE OF HIS RIGHT TO REMAIN SILENT VIOLATED DUE PROCESS AND DENIED HIM A FAIR TRIAL.

The Fifth Amendment to the United States Constitution guarantees that a criminal defendant shall not be compelled to be a witness against himself. U.S. Const. amend V. Nor may the State comment on a

defendant's exercise of that right. Griffin v. California, 380 U.S. 609, 613-15, 14 L.Ed.2d 106, 85 S.Ct. 1229 (1965). The Washington Constitution guarantees the same protections. Wash. Const., art. I, § 9; State v. Earls, 116 Wn.2d 364, 374-74, 805 P.2d 211 (1991) (federal and state protections coextensive).

"The right against self-incrimination is liberally construed. It is intended to prohibit the inquisitorial method of investigation in which the accused is forced to disclose the contents of his mind, or speak his guilt." State v. Easter, 130 Wn.2d 228, 236, 922 P.2d 1285 (1996) (citations omitted). Thus, it is constitutional error for the State to elicit testimony or make closing argument as to the defendant's silence to infer guilt. Easter, 130 Wn.2d at 236. Further, it is well settled that comments on the defendant's post-arrest silence violate due process, because the Miranda warnings constitute an assurance that the defendant's silence will carry no penalty. Easter, 130 Wn.2d at 236; State v. Romero, 113 Wn. App. 779, 786-87, 54 P.3d 1255 (2002) (citing Doyle v. Ohio, 426 U.S. 610, 619, 96 S.Ct. 2240, 49 L.Ed.2d 91 (1976)); State v. Fricks, 91 Wn.2d 391, 395-96, 588 P.2d 1328 (1979). "A police witness may not comment on the silence of the defendant so as to infer guilt from a refusal to answer questions." State v. Lewis, 130 Wn.2d 700, 705, 927 P.2d 235 (1996).

In Romero, the court established a framework for analyzing whether a comment on the defendant's silence is constitutional error. See Romero, 113 Wn. App. at 790-91. If the comment on the defendant's silence is direct, constitutional error exists. When a comment from a state agent is indirect, three questions are considered to determine whether there was constitutional error. First, could the comment reasonably be considered purposeful? Second, could the comment be unresponsive but either given in an attempt to prejudice the defense or resulting in likely prejudice to the defense? And third, was the comment exploited by the State during the course of trial? If any of these questions is answered in the affirmative, the indirect comment is constitutional error. Romero, 113 Wn. App. at 790-91.

Both direct and indirect comments on Bryceland's silence were admitted at trial, and both errors require reversal.

a. **The detective who interviewed Bryceland after his arrest directly commented on Bryceland's silence.**

Bryceland was interviewed at the police station after being advised of his rights. 1RP 29. Although he said he was willing to talk, he did not give the detective specific answers. 1RP 30-32. At trial, Detective Thuring testified that Bryceland and the other suspects were tired when they were interviewed, and they were not very cooperative. 2RP 281.

Bryceland appeared to nod off at times, mumbled his responses, and talked in circles. 2RP 281-82. Thuring said that Bryceland knew they were talking about a robbery, but his answers were not very clear. 2RP 285. Bryceland told Thuring that he was doing what Jones wanted him to do, but he would not say what that was. 2RP 285. Thuring testified that he lost patience with Bryceland and ended the interview early, because Bryceland was talking in circles and his answers were indefinite, and "[i]t was clear … that he was not really wanting to cooperate." 2RP 286.

Any direct police testimony as to the defendant's refusal to answer questions is a violation of the right to silence. Romero, 113 Wn. App. at 792 (citing Easter, 130 Wn.2d at 241). In Romero, a law enforcement officer testified that after the defendant was arrested and placed in a holding cell, he was somewhat uncooperative, chose not to waive his rights, and would not talk. Romero, 113 Wn. App. at 785. This was a direct comment on the defendant's choice of silence in response to questioning and thus constitutional error. Id. at 792.

Here, as in Romero, the detective directly commented on Bryceland's decision not to answer questions after he was advised of his right to remain silent. The detective characterized Bryceland as uncooperative and said that although he agreed to talk he did not respond to the detective's questions. The only purpose this comment served was to

infer that Bryceland's lack of cooperation was more consistent with guilt than with innocence. This direct comment on Bryceland's refusal to answer questions violates his right to silence.

Defense counsel did not object to this testimony. Instead, he attempted to clarify the circumstances on cross examination, establishing that the interview occurred around 4:30 a.m. and Bryceland had been in the interview room since about 1:00 a.m. 3RP 309. A comment on exercise of the right to remain silent is manifest constitutional error which may be raised for the first time on appeal, however. Romero, 113 Wn. App. at 790-91. Counsel's failure to object does not preclude review of this error.

b. The State's presentation of portions of recorded phone calls constituted an indirect comment on Bryceland's right to remain silent.

At trial, a corrections officer with the Kitsap County Sheriff's Office testified that he maintains the inmate telephone system at the Kitsap County Jail. He reviewed calls from Bryceland's account and prepared a recording for the prosecution. He identified the recording at trial. 3RP 393-96. The prosecution investigator testified that she prepared a transcript of the recorded calls, which was admitted and presented to the jury. The investigator identified the calls as the recording was played in court. 3RP 399-412.

Included in the recording was a conversation Bryceland had with a woman in which she said,

> So, they're gonna say, Kyle, why did you drive said car to the destination to take a bag out and put it in the trunk? Why are …Why did the owner of this car happen to be in a place that you…you know…supposedly dropped him? How…how did this all…you…you gotta understand. They're gonna try to paint the picture. How did all these events happen? Why? How? Where? And who? And they're gonna try to back evidence and they're gonna do all of this stuff to prove you guilty.

Exhibit 35, at 9. Bryceland responded. "Yah." Next, the woman said,

> Well…you know…you just gotta really think like what is gonna prove your innocence. How…how you gonna prove this to people who are gonna sit there and interrogate you? Why were you here? You have to come up with…with like an answer.

Exhibit 35, at 9. Bryceland responded, "Ah well, I came up with all that already (inaudible)." Id.

Defense counsel objected to this portion of the recording, arguing that the woman's statements constituted an impermissible comment on the presumption of innocence and the right to silence, a misstatement of law, and an implication that Bryceland needed to testify about what happened, when he had a right not to. 1RP 47-48, 50. The State argued that the conversation demonstrated a consciousness of guilt because Bryceland did not deny participation or knowledge and said he already came up with a story. 1RP 49. The court denied the motion to exclude the statements. 1RP 52.

It is impermissible to invite the inference of guilt from the exercise of constitutional rights. State v. Nemitz, 105 Wn. App. 205, 215, 19 P.3d 480 (2001). In Nemitz, an officer testified that when arrested the defendant presented an attorney's business card which contained an explanation of rights if stopped by police. It was error for the court to deny a motion in limine to exclude information about the card, because it had no probative value and served only to create an inference of guilt from the exercise of constitutional rights. Id. Similarly, here, the States use of this portion of the recorded telephone call served no purpose other than to create the inference of guilt from Bryceland's exercise of constitutional rights.

A criminal defendant has the right not to testify, and exercise of that right may not be used to imply guilt. State v. Mendes, 180 Wn.2d 188, 194-95, 322 P.3d 791 (2014), cert. denied, 135 S. Ct. 1718, 191 L. Ed. 2d 688 (2015). Furthermore, the State has the burden to prove every element of the crime beyond a reasonable doubt. Apprendi v. New Jersey, 530 U.S. 466, 476-77, 120 S.Ct. 2348, 147 L.Ed.2d 435 (2000). "A criminal defendant has no burden to present evidence, and it is error for the State to suggest otherwise." State v. Montgomery, 163 Wn.2d 577, 597, 183 P.3d 267 (2008).

The statements made during this portion of the telephone call were clearly contrary to constitutional principles regarding the right to silence, the presumption of innocence, and the State's burden of proof. There was no probative value to erroneous statements that Bryceland had to prove his innocence by answering questions. The State's use of this portion of the phone call created the prejudicial impression that Bryceland's exercise of his constitutional right to silence was more consistent with guilt than with innocence.

Although the erroneous statements were not made by a police officer or State agent, they were presented to the jury by the prosecutor through the testimony of two State agents. Moreover, the introduction of this evidence cannot be considered anything but purposeful. It was a recorded statement which the State had transcribed and chose to use. There was no doubt as to what the statement would be and no legitimate purpose for putting it before the jury. Under Romero, the State's use of these statements constitutes an indirect comment on Bryceland's constitutional right to silence and is constitutional error. Romero, 113 Wn. App. at 790-91 (indirect comment rises to constitutional proportions when it "could reasonably be considered purposeful, meaning responsive to the State's questioning with even slight inferable prejudice to the defendant's claim of silence[.]").

c. The constitutional error requires reversal.

Constitutional error is harmless only if the reviewing court is convinced beyond a reasonable doubt that any reasonable jury would reach the same result absent the error, and the untainted evidence is so overwhelming it necessarily leads to a finding of guilt. Easter, 130 Wn.2d at 242. The State cannot prove that the error was harmless in this case.

Only two of the five people in the alley at the time of the robbery testified at trial, and their testimony was not consistent. While Trerise speculated that Bryceland knew the robbery was going to occur, Lundy testified that both he and Bryceland were taken by surprise and hid when Jones approached the car. There was no evidence that Bryceland knew Jones had a gun. Given the quantity of narcotics found in the car, the defense argument that Bryceland knew there was going to be a drug deal but not a robbery was reasonable. The State's evidence was not so overwhelming that the jury necessarily would have found Bryceland guilty even without the improper inference that exercise of his constitutional right to silence was more consistent with guilt than innocence. The improper comments on Bryceland's right to silence were not harmless beyond a reasonable doubt, and his conviction must be reversed.

2. ERRONEOUS ADMISSION OF THE IRRELEVANT AND PREJUDICIAL RECORDED STATEMENT REQUIRES REVERSAL.

Even if the recorded statement was not an indirect comment on Bryceland's exercise of his constitutional rights, the court abused its discretion in admitting the statement over defense objection. See Nemitz, 105 Wn. App. at 215 (court erred in denying motion in limine to exclude business card listing constitutional rights which had no probative value and served only to create prejudicial inference of guilt). There was no legitimate basis for admitting the recorded statement of the person Bryceland was speaking to. It was not an admission by party, because it was not an admission. It was simply a misstatement of law. Moreover, the statement was not even made by Bryceland.

The other speaker's misstatement of the law was wholly lacking in probative value and could serve only to confuse the jury and prejudice the defense. The evidence should have been excluded under ER 401 ("'Relevant evidence' means evidence having any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence."), ER 402 ("Evidence which is not relevant is not admissible."), and ER 403 ("Although relevant, evidence may be excluded if its

probative value is substantially outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury....").

Evidentiary error is prejudicial if, within reasonable probabilities, the error materially affected the outcome of the trial. State v. Neal, 144 Wn.2d 600, 611, 30 P.3d 1255 (2001). Improper admission of evidence constitutes harmless error only "if the evidence is of minor significance in reference to the evidence as a whole." Id. Given the lack of evidence that Bryceland knew Jones was planning a robbery rather than a drug transaction, it is likely the jury's verdict rested on the impression created by the recorded statement, together with the detective's improper testimony, that Bryceland would have explained the State's evidence if he were innocent. There is a reasonable probability the erroneous admission of this evidence affected the verdict, and Bryceland's conviction must be reversed.

3. THIS COURT SHOULD EXERCISE ITS DISCRETION AND DECLINE TO IMPOSE APPELLATE COSTS.

The trial court entered an order of indigency finding that Bryceland was entitled to seek appellate review wholly at public expense, including appointed counsel, filing fees, costs of preparation of briefs, and costs of preparation of the verbatim report of proceedings. CP 91-92. In addition,

the trial court found Bryceland was unlikely to have the ability to pay LFOs in the future and imposed only the mandatory LFOs. 5RP 27.

a. **The serious problems *Blazina* recognized apply equally to costs awarded on appeal, and this Court should exercise its discretion to deny cost bills filed in the cases of indigent appellants.**

Our supreme court in Blazina recognized the "problematic consequences" legal financial obligations (LFOs) inflict on indigent criminal defendants. State v. Blazina, 182 Wn.2d 827, 836, 344 P.3d 680 (2015). LFOs accrue interest at a rate of 12 percent so that even persons "who pay[] $25 per month toward their LFOs will owe the state more 10 years after conviction than they did when the LFOs were initially assessed." Id. This, in turn, "means that courts retain jurisdiction over the impoverished offenders long after they are released from prison because the court maintains jurisdiction until they completely satisfy their LFOs." Id. "The court's long-term involvement in defendants' lives inhibits reentry" and "these reentry difficulties increase the chances of recidivism." Id. (citing AM. CIVIL LIBERTIES UNION, IN FOR A PENNY: THE RISE OF AMERICA'S NEW DEBTOR'S PRISONS, at 68-69 (2010), available at https://www.aclu.org/files/assets/InForAPenny_web.pdf; KATHERINE A. BECKETT, ALEXES M. HARRIS, & HEATHER EVANS, WASH. STATE MINORITY & JUSTICE COMM'N, THE ASSESSMENT AND CONSEQUENCES OF

LEGAL FINANCIAL OBLIGATIONS IN WASHINGTON STATE, at 9-11, 21-22, 43, 68 (2008), available at http://www.courts.wa.gov/committee/pdf/2008LFO_report.pdf).

To confront these serious problems, our supreme court emphasized the importance of judicial discretion: "The trial court must decide to impose LFOs and must consider the defendant's current or future ability to pay those LFOs based on the particular facts of the defendant's case." Blazina, 182 Wn.2d at 834. Only by conducting such a "case-by-case analysis" may courts "arrive at an LFO order appropriate to the individual defendant's circumstances." Id.

The Blazina court addressed LFOs imposed by trial courts, but the "problematic consequences" are every bit as problematic with appellate costs. The appellate cost bill imposes a debt for losing an appeal, which then "become[s] part of the trial court judgment and sentence." RCW 10.73.160(3). Imposing thousands of dollars on an indigent appellant after an unsuccessful appeal results in the same compounded interest and retention of court jurisdiction. Appellate costs negatively impact indigent appellants' ability to move on with their lives in precisely the same ways the Blazina court identified.

Although Blazina applied the trial court LFO statute, RCW 10.01.160, it would contradict and contravene Blazina's reasoning not to

require the same particularized inquiry before imposing costs on appeal. Under RCW 10.73.160(3), appellate costs automatically become part of the judgment and sentence. To award such costs without determining ability to pay would circumvent the individualized judicial discretion that Blazina held was essential before including monetary obligations in the judgment and sentence.

Bryceland has been determined to qualify for indigent defense services on appeal. To require him to pay appellate costs without determining his financial circumstances would transform the thoughtful and independent judiciary to which the Blazina court aspired into a perfunctory rubber stamp for the executive branch.

In addition, the prior rationale in State v. Blank, 131 Wn.2d 230, 930 P.2d 1213 (1997), has lost its footing in light of Blazina. The Blank court did not require inquiry into an indigent appellant's ability to pay at the time costs are imposed because ability to pay would be considered at the time the State attempted to collect the costs. Blank, 131 Wn.2d at 244, 246, 252-53. But this time-of-enforcement rationale does not account for Blazina's recognition that the accumulation of interest begins at the time costs are imposed, causing significant and enduring hardship. Blazina, 182 Wn.2d at 836; see also RCW 10.82.090(1) ("[F]inancial obligations imposed in a judgment shall bear interest from the date of the judgment

until payment, at the rate applicable to civil judgments."). Moreover, indigent persons do not qualify for court-appointed counsel at the time the State seeks to collect costs. RCW 10.73.160(4) (no provision for appointment of counsel); RCW 10.01.160(4) (same); State v. Mahone, 98 Wn. App. 342, 346-47, 989 P.2d 583 (1999) (holding that because motion for remission of LFOs is not appealable as matter of right, "Mahone cannot receive counsel at public expense"). Expecting indigent defendants to shield themselves from the State's collection efforts or to petition for remission without the assistance of counsel is neither fair nor realistic. The Blazina court also expressly rejected the State's ripeness claim that "the proper time to challenge the imposition of an LFO arises when the State seeks to collect." Blazina, 182 Wn.2d at 832, n.1. Blank's questionable foundation has been thoroughly undermined by the Blazina court's exposure of the stark and troubling reality of LFO enforcement in Washington.

Furthermore, the Blazina court instructed *all* courts to "look to the comment in GR 34 for guidance." Blazina, 182 Wn.2d at 838. That comment provides, "The adoption of this rule is rooted in the constitutional premise that *every level of court* has the inherent authority to waive payment of filing fees and surcharges on a case by case basis." GR 34 cmt. (emphasis added). The Blazina court also suggested, "if

someone does meet the GR 34[(a)(3)] standard for indigency, courts should seriously question that person's ability to pay LFOs." Blazina, 182 Wn.2d at 839. This court receives orders of indigency "as a part of the record on review." RAP 15.2(e). "The appellate court will give a party the benefits of an order of indigency throughout the review unless the trial court finds the party's financial condition has improved to the extent that the party is no longer indigent." RAP 15.2(f). This presumption of continued indigency, coupled with the GR 34(a)(3) standard, requires this court to "seriously question" an indigent appellant's ability to pay costs assessed in an appellate cost bill. Blazina, 182 Wn.2d at 839.

This court has ample discretion to deny cost bills. RCW 10.73.160(1) states the "court of appeals . . . *may* require an adult . . . to pay appellate costs." (Emphasis added.) "[T]he word 'may' has a permissive or discretionary meaning." Staats v. Brown, 139 Wn.2d 757, 789, 991 P.2d 615 (2000). Blank, too, acknowledged appellate courts have discretion to deny the State's requests for costs. 131 Wn.2d at 252-53. Given the serious concerns recognized in Blazina, this court should soundly exercise its discretion by denying the State's requests for appellate costs in appeals involving indigent appellants, barring reasonable efforts by the State to rebut the presumption of continued indigency.

Bryceland respectfully requests that this court deny a cost bill in this case should the State substantially prevail on appeal.

b. **Alternatively, this court should remand for superior court fact-finding to determine Bryceland's ability to pay.**

In the event this court is inclined to impose appellate costs on Bryceland should the State substantially prevail on appeal, he requests remand for a fair pre-imposition fact-finding hearing at which he can present evidence of his inability to pay. Consideration of ability to pay before imposition would at least ameliorate the substantial burden of compounded interest. At any such hearing, this court should direct the superior court to appoint counsel for Bryceland to assist him in developing a record and litigating his ability to pay.

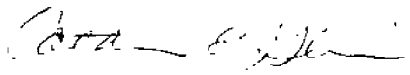
If the State is able to overcome the presumption of continued indigence and support a finding that Bryceland has the ability to pay, this court could then fairly exercise its discretion to impose all or a portion of the State's requested costs, depending on his actual and documented ability to pay.

D. CONCLUSION

For the reasons addressed above, this Court should reverse Bryceland's conviction of first degree robbery and remand for a new trial.

DATED November 10, 2016.

Respectfully submitted,



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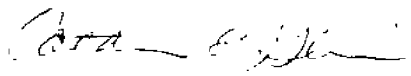

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